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ABSTRACT

Service delivery to handicapped pupils is discussed in regard to the relationship between the California Master Plan for Special Education (see EC 062 915) and the Bureau of Pupil Personnel's Plan for Improvement of Guidance Services. The goals, benefits and limitations of both plans are described; and each plan is examined and compared in terms of aspects such as administrative organization, accountability, potential legislative implementation, financial support, and staffing considerations. The author concludes that the Master Plan for Special Education contains implementation proposals (lacking in the recommendations for improving guidance services) which make it worthy of statewide legislative support. Among proposed recommendations are adoption of a comprehensive plan for interagency coordination and creation of local special education advocates who have authority as well as responsibility for ensuring service delivery. (LH)

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THE POSSIBLE RELATIONSHIP OF THE CALIFORNIA MASTER PLAN
FOR SPECIAL EDUCATION TO THE STATE DEPARTMENT OF EDUCATION
BUREAU OF PUPIL PERSONNEL SERVICES PLAN FOR IMPROVEMENT OF
GUIDANCE SERVICES IN CALIFORNIA RELATIVE TO DELIVERY OF
SERVICES TO HANDICAPPED PUPILS: WHO'S ON FIRST?

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What is the Master Plan for Special Education and What Should it Do?

On January 10, 1974, the State Board of Education of California, meeting in Sacramento unanimously approved the adoption of a lengthy document entitled California Master Plan for Special Education (3) and its companion document Implementation Design for the Master Plan for Special Education in California. (7) The Board itself had, during 1971-72 publicly stated that creation of a master plan for improvement of programs and services for the handicapped in our schools was a high priority for the near future. Toward this end the State Board created a statewide advisory body to be called the Commission on Special Education which was, and still is, charged with the responsibility to "study and provide assistance and advice to the State Board of Education in new or continuing areas of research, program development and evaluation in special education" (10,2). This Commission, consisting of a highly selected cross section of district and county level public education teachers and administrators, lay public, legislators, parents, community agency and volunteer organization representation immediately set out to gain access to public and professional opinion relative to formulation of such a comprehensive set of recommendations through public information gathering and other inputs from literally thousands of sources throughout the State of California. Chief among the architects of the resultant documents themselves, and close working partners throughout the development of these historic documents have been personnel from the Special Education Support Unit (formerly Division of Special Education, State Department of Education). The road to unanimous approval and formal adoption of these documents as a plan to generate necessary legislation and thus far reaching program changes was certainly not as simple as it may sound in this brief history.

The State Board of Education itself had rejected a "final" draft at an earlier stage of presentation, due primarily to what it felt was unnecessarily

cumbersome language and its concern for certain technical questions (i.e., clarification on just how many potential pupils should perhaps not become eligible for certain services as part of the Board recommended program).

Thus there have been numerous rewritings and there will continue to be numerous specific language deletions, additions or other semantic questions which will need clarification and/or elaboration as implementing legislation and pilot projects go forward in the next several years. Those who have been involved will agree, however, that the document itself does continue to hold most of the same promises, the same ideals and goals in mind as they were originally set forth. While primarily a statement of philosophy and direction, the plan does deal with "nitty gritty" details in a specific enough way to emerge as a powerful source of potential in unifying the currently often "fragmented" service delivery systems for handicapped (or those the new plan refers to as "individuals with exceptional needs."). (3,p.1)

What is the so called Master Plan? While it is beyond the scope of this paper to thoroughly analyze all aspects of the dynamic ever changing document and implementing legislation itself, a few explanatory statements would, hopefully, summarize well the main concepts contained in the Master Plan for Special Education.

1. The Master Plan for Special Education is a broad framework based on the principle that no child shall be denied educational opportunity commensurate with his ability. It will provide the basis for Comprehensive Plans to be written at the local level taking into consideration local conditions and local needs.
2. A Comprehensive Plan must provide for a complete range of educational service for every type of exceptionality. From age 3 to 4 years, 9 months and between 18 and 21 years, the individual must be identified as requiring

intensive full time special education services. Below age 6 and beyond age 16, attendance is not compulsory.

3. A Comprehensive Plan may be developed by:

- (a) Any school district which intends to provide the full program or special education services.
- (b) District or districts acting jointly with the Office of the County Superintendent.
- (c) Contiguous districts or counties.

It should be noted that the appropriate County Schools office must be a partner in the approval of a plan and application to the State Department of Education by any Responsible Local Agency (RLA).

4. All individuals with exceptional needs residing in the area served be sought out and receive assessment, instructional planning and follow-up.

Assessment will be on two levels:

- (a) School Appraisal Team (principal-teacher level with other professionals as needed).
- (b) Education Assessment Team (for those who require more definite assessment, whose educational plan has not been effective, who are required to leave school of residence, attend Special Classes or Centers, or upon appeal from parent or Program Specialist).

5. Individuals with exceptional needs will be educated according to their learning characteristics, not their disability labels. The use of labels will be eliminated and the single designation "individuals with exceptional needs" used.

For reporting purposes, there are four program classifications:

- (a) The communicately handicapped (deaf; deaf-blind; severely hard of hearing (inc. aphasic); those with language and speech problems).

- (b) The physically handicapped (blind; partially seeing; orthopedically handicapped; health impaired - including drug dependent and pregnant minors).
 - (c) The learning handicapped (learning disabled and/or behavior disordered; educationally retarded - former EMR).
 - (d) The severely handicapped (developmentally handicapped; trainable retarded; autistic; seriously emotionally disturbed).
6. Individuals with exceptional needs shall be maintained in regular classrooms whenever possible with necessary support services provided to the students and the regular classroom teacher. They will be served in a setting which promotes maximum interaction with the general school population which is appropriate to the needs of both.
7. If a public school cannot reasonably be expected to provide the required program, there will be cooperation with other agencies to assure that the necessary services are rendered. These relationships among educational agencies (district and/or county) or with other public and private agencies shall be spelled out in the locally developed Comprehensive Plan. Contracts with non-public school agencies may be undertaken.
8. Individuals with exceptional needs will have access to eight program components which can be put together in any appropriate combination. Flexible scheduling is stressed with a prescriptive teaching approach.

Four are instructional programs:

- (a) Special Classes and Centers
- (b) Resource Specialist Programs
- (c) Designated Instruction and Services
- (d) Non-public School Services

Four are Supporting Services:

- (a) Identification, Assessment and Instructional Planning

- (b) Management and Support Services
 - (c) Special Transportation Services
 - (d) Capital Outlay and Equipment
9. Income is generated on the basis of programs provided not on categorical disability groupings. The State will fund the excess costs of standard Special Education programs (up to a certain maximum).
 10. Parents will be involved in planning, placement and review. They shall receive a copy of goals set for their child in writing and must give consent for any special services offered in writing. Parents shall receive periodic progress reports and have the right of appeal.
 11. All Comprehensive Plans must have an evaluation component.
 12. All Comprehensive Plans must contain explicit due process procedures for all pupils (right to appeal placement decision, etc.).
 13. All Comprehensive Plans must provide for an Advisory Committee with parent and public representation to advise the Special Education Administrator.

In discussing briefly the sweeping revisions of the current systems of categorizing and delivering special education services described in the Master Plan, it would perhaps be useful to illustrate using the example of the current program standards wherein speech therapists often independently decide a pupil is in need of speech therapy. He thus begins providing the needed service to the pupil. The pupil may or may not have been designated by a duly constituted local Admissions and Discharge Committee (not now mandatory in all cases) as "physically handicapped," (although perhaps the pupil does attend another type of special education class or program). In other words, the Speech Therapist alone has often defined who the so-called "individual with exceptional needs" would be and has been funded for service to each such individual pupil for whom he provides service (not necessarily direct and face to face) at a certain rate per "clock hour of instruction" (or service).

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Under the Master Plan concept this sort of independent functioning of entities responsible for delivery of various services to those defined as "individuals with exceptional needs" should not take place in and as part of (or outside of) a comprehensive plan. To receive special education services as may be appropriate (such as "Designated Instruction," e.g., speech therapy) the pupil must first be evaluated and the service requested and approved by at least one of two professional levels (the local School Appraisal Team and the Education Assessment Team, neither of which necessarily would normally include a speech therapist). A referral or request for such designated instruction will be made for the pupil defined as an "individual with exceptional needs" prior to receiving such service. The funding for the clock-hour of service is, at this writing, based on the "face-to-face" contact only with 1 to 4 pupils at one time for 1 hour with no therapist able to collect for more than a total of 4 clock-hours of direct service per day.

Beyond the specific concepts enumerated above, several features emerge from the document entitled "Implementation Design for the Master Plan for Special Education in California (7) which elaborate and summarize the enumerated concepts.

These are:

1. All special education programs be mandatory.
2. There be a single criterion of eligibility for special education services, the designation, "Individual with Exceptional needs."
3. There is provision for all potential needed services and programs in each locally developed comprehensive plan (which is to be established within certain guidelines provided by the State Board of Education) and all agencies dealing with mutual clientele need to be included in such a plan with regard to the provision of such potential services.

4. The present 28 program options (i.e., TMR, Orthopedically Handicapped, Special Day Integrated Programs, Individual Instruction at age levels or combination of ages 3 through 8, age levels 9 through 21, etc.) are to be reorganized into 8 categorical components which are all designed to make available various instructional programs or supporting services to the individual with exceptional needs.
5. The plan recommends that the State fund costs for delivery of services for the 8 program components which are in excess of the so called foundation program. Ultimately of course, the Legislature of this State will decide on the question of appropriations. Another factor in the funding future is HR69, and the current Federal guidelines which will have to be met by states in order to receive Federal dollars for Special Education programs. These new "priorities" will also significantly effect the future use of Title VI-B funds for such purposes in California.
6. Evaluation and progress measurement of pupil, process and program effectiveness will be an important part of each comprehensive plan and state level review.
7. Through the various program options for developing a plan for delivery of services and program components, responsibility and authority can be more adequately fixed. Accountability is the theme.
8. Participation of the community in development of a comprehensive plan, its implementation and evaluation will be insured by provisions for a Community Advisory Committee.
9. State Residential Schools and Diagnostic Centers such as for the blind, deaf and neurologically handicapped will continue to provide direct services to eligible pupils not served in a local area.
10. Coordinated interagency effort is recognized as essential to the success of any comprehensive plan where individual pupils are also potential clients

of many other social service agencies in a community or area.

- II. The Master Plan envisions an ongoing inservice plan to continuously upgrade the skills of both general and special educators at the local level and further that changes will be made in the teacher preparation and training institutions as well as the state licensing level to insure that new teachers have requisite skills. At present, for example, new credential standards are developing for teachers of "Learning Handicapped." (According to a State Department of Education spokesman, the Department is concerned that at present the Teacher Preparation and Licensing Commission functions as an "independent" legal body, thus no assurance exists that Department standards for training would necessarily be implemented.)

It is anticipated that upwards of 155,00 additional pupils, or a total of approximately 597,000 individuals (for a conservatively estimated minimum cost of \$454,000,000) with exceptional needs could be eventually served in California, including eligible individuals in certain institutions and programs now served by other agencies (such as State Hospitals). It is hoped that all local educational agencies could be providing education services under a comprehensive plan by 1980-81, although original legislation (AB4040) does not mandate development of such an alternative Special Education program at the present time. Alternative Special Education regulations are now being drawn up to be used as models for the special approval "pilot" districts, and no doubt will serve as a basic requirement for all areas eventually mandated to develop a "comprehensive plan." Under present plans, the funding levels envisioned for various components (i.e., "designated instruction" or service and presently at \$20 for one pupil service hour) have been somewhat more realistically derived from data collected throughout the State than current funding levels (a result of Assembly Bill 1267 and its progenitor Senate

Bill 90) but will undoubtedly increase as "Pilot Project" program information is collected and reviewed. The Master Plan is currently being phased in with a highly selected and especially funded (Title VI-B EHA) group of single districts or combination of districts or county schools offices with funding in the near future to be provided less from Title VI-B funds than at present. The initial CPA's (comprehensive planning agencies) are, in a sense, developing plans on how to develop a comprehensive plan. It is clear, for instance, that at present no specific guidelines exist as to what a local "comprehensive plan" must look like on paper. At the end of the initial year of development and study it is hoped that the implementing legislation (AB4040) and certain modifying legislation which is now under discussion will probably be sought and will be fully developed, along with the appropriate funding and that full implementation in approved local agencies can actually begin. At the present time AB4040 should probably be thought of as a "model" for future legislation. Additional sets of CPA's will then be in a planning development phase during 1975-76 and 1976-77 school years, again working toward full eventual implementation. Two important points should be mentioned here. First, districts or "agencies" not approved to operate such a "plan" may not (without other exemptions) waive present Education Code and Title V regulations governing operation of Special Education programs, and secondly, AB4040 provides a vehicle which operating agencies approved to operate a program may use (must use), and which effectively waives all current regulations for present "traditional" programming.

What is A Plan for Improvement of Guidance Services in California?

Elsewhere in the California State Department of Education, in early July 1972, a special task force was charged by Superintendent of Public Instruction, Wilson Riles, and the State Board of Education to study the guidance and

counseling task force was headed by the Program Manager of the State Department of Education, Bureau of Pupil Personnel Services. The task of conducting a statewide "student needs" (4,p.1) assessment survey was begun about October of 1972. As a result of the combination of several of the regional meetings, questionnaire student opinion surveys (55,285 were analyzed) and separate meetings with numerous professional and educational organizations, a series of documents was to be created beginning in 1973. One of the most significant was A Plan for the Improvement of Guidance Services in California (4) and its Appendix (5). The "Appendix" is an extensive (146 page) summary of all the statistical (rank order, percentage, number, etc.) findings and answers to survey questions summarized in tabular form region by region (groups of counties in California). From the data collected, the problem areas of career development, racism, drug abuse, campus conflicts and venereal disease were pointed out. It was also clearly indicated that the needs of students surveyed are the traditional needs of people such as the need for personal individual attention, the need for help in understanding themselves, and the need for help in planning their future. While it is understood that these documents too, will be in dynamic change in the coming months, and that more "complete" drafts have been promised by the PPS Bureau in the future, present documents will serve as the basis for illustration.

The basic concepts for guidance services as enumerated in the "plan" include the following:

1. Guidance programs are designed for all students and provide for continuous, developmental activities throughout the students' tenure in school. These developmental or preventative programs focus on meeting basic student needs. Effective programs are not "hit and miss" nor can student needs be met by the "drop-in" method.

2. Even though the basic activities may be the same for all students, more and a different kind of help should be provided for some students, the disadvantaged for example. Special programs are also needed to meet current critical problems.
3. Guidance services are the responsibility of the entire school staff. The guidance specialist has specific responsibility for providing leadership, consultation and special skills where needed.
4. The guidance specialist is first of all a student advocate. It is not his responsibility always to help the student adjust to the institution but he may need to assist the institution in changing to meet student needs.
5. The school guidance program makes use of and coordinates with all community resources. Lay people, paraprofessionals and other community professionals provide services that supplement those of the guidance staff. Time is provided for coordination of these sources of help.
6. Career guidance is emphasized for all students not just for "terminal" students. A developmental approach to career guidance is used beginning in kindergarten and continuing throughout the student's entire tenure in school. Students are encouraged to look at all alternatives open to them in line with their abilities, interests, and desired life styles.
7. An effort is made to help each individual develop a good self concept by attacking the cause of student alienation rather than just coping with symptoms such as from drug abuse, campus conflicts, racism, etc.
8. Guidance personnel are involved with developing total school as well as guidance goals and objectives and are attempting to make curriculum more relevant to students and a more human place for students to be.
9. Guidance staff are involved with helping teachers to provide the proper learning atmosphere in the classroom as well as providing inservice

related to how children learn.

10. The school psychologist does more than test or assess learning problems of students and recommend placement in special classes. He assists teachers in developing and implementing strategies to solve problems.
11. The guidance program is a competency based program which has specific objectives carried out by the persons having specific competencies. Evaluation, both short range and long range, is an integral part of the program.

Evidence for the fact that the Bureau of Pupil Personnel Services, State Department of Education, is apparently directing itself toward a "management by objectives" approach in developing future development systems for Pupil Personnel Services is evidenced in the cooperative monograph effort with the California Personnel & Guidance Association entitled Accountability in Pupil Personnel Services: A Process Guide for the Development of Objectives (1). This document relies heavily upon the National Study for Guidance (NSG) and ostensibly relates to all pupils in all areas of school functioning. Of course the emphasis on accountability and bringing "criterion reference and norm-reference measurement" (ibid. p.31) to this area of the educational mileau or curriculum is very laudable and has been conspicuously absent in the area of guidance and counseling. As described, perhaps more succinctly by O'Hare & Lasser (11, p.11) "the literature contains few references to guidance programs in which behavioral objectives and outcome referenced evaluation strategies are used." Other important documents bearing directly upon the current emphasis to bring more structure and coordination to the delivery to guidance and pupil personnel services in California include:

1. Stating the Goals of Counseling (8). In this 1966 publication authored by John Krumboltz and published for the California Counseling and Guidance

Association, Mr. Krumboltz sets forth what is essentially a guide to translating the language of goals such as "understanding" into more meaningful (i.e., illustrative observable overt behavioral reference) terms capable of measurement.

2. The publication Evaluating Pupil Personnel Programs (11). This is a publication in which we see again reinforced what has been the somewhat traditional organizational patterning in at least some school districts, that is, the inclusion of special education in the long list (i.e., health, pupil attendance, social work, testing and psychological services including home-school counseling) of what is considered the domain of the pupil personnel administrator. According to Miller, however, in Guidance Principles and Services, "pupil personnel services generally includes attendance services, school health services, school psychological services, school work services and guidance services." (9, p.145) Further evidence also exists in the work of O'Hare & Lasser, for concluding that ostensibly, PPS programs may become more "outcome referenced" (11, p.11). Further, in citing Welman's National Study of Guidance, it is pointed out by the author that "this should provide the kinds of information that will enable the prediction of the probability that specified outcome will result when a specific guidance process is used in a particular situation with a given type of student" (ibid, p.17).

With regard to the Bureau of Pupil Personnel Services itself progress is being made in the formulation of specific recommendations pursuant to conclusions reached from the year long study as to (1) status of existing programs and (2) goals for the future.

Collection of information regarding ongoing (hopefully exemplary) practices with the hope in mind that perhaps a suggested model for broad implementation might be developed is provided for by the Bureau of Pupil Personnel Services

in the Validation Form for Onsite Visitation of a Promising Program or Promising Practice (12) and in the companion "JEC 10/73" form titled "Criteria for the Identification of Promising Practices in Guidance Programs." (6) While an updated version of the series of chapters comprising the plan for the improvement of guidance services in California is not available as of this writing, a summary of the plan as to conclusions and recommendations will also be helpful in anticipation of the scope and general direction of the forthcoming documents.

Two general but significant outcomes of the year long study by the task force are evident: (1) The consensus of all groups surveyed was that guidance services to students should be an important part of the educational program for all students at all grade levels, and (2) that guidance services as they now exist are not adequate.

The reason for these inadequacies seem to include the following:

- (a) a shortage of guidance personnel
- (b) inadequacy of training
- (c) current role of the counselor and the school psychologist
- (d) attitude of guidance personnel toward students

Also clear from the Task Force data are the anticipated roles of: the local school district, the county school office and the State Department of Education. With regard to defining and implementing the program of each the recommendations are:

1. School District

- (a) conduct local needs assessments to determine guidance priorities
- (b) provide for inservice training of staff, including administrators, teachers and community

2. County Schools

- (a) continue to work cooperatively with the State Department in leadership activities

- (b) work cooperatively with State Department professional organizations and district leaders in implementing the recommendations of the State plan, and

3. State Department of Education

- (a) provide leadership in the plan for change
- (b) develop a continuing needs assessment on which to base annual priorities for staff
- (c) evaluation
- (d) dissemination
- (e) inservice training
- (f) liaison activities with professional guidance organizations

Among major goals listed for 1973-74 were:

- (a) to implement the plan developed by the Guidance and Counseling Task Force
- (b) to provide an efficient and effective means of evaluating all or selected aspects of any guidance program
- (c) to reduce the numbers of alienated youth in California schools
- (d) to improve the effectiveness of career guidance offered to students in California schools
- (e) to continue to provide leadership and supervision for the guidance, counseling and testing section of ESEA Title III and,
- (f) to provide coordination of all efforts toward improvement of guidance services within the department and with professional organizations.

There can be little doubt that, according to the authors of the "Preliminary Plan," all pupils (not excepting the handicapped in or out of Special Education Programs) are, as they often have been in the past, within the legitimate domain of the Pupil Personnel Services Department. This also

ostensibly seems to apply with regard to certain services which are presumably provided through the designated Special Education Administrator in a Comprehensive Plan (as coordinated and developed by the Resource Specialists and Program Specialists components).

How Does the Master Plan for Special Education Relate to the
Delivery of Pupil Personnel Services for Individuals with
Exceptional Needs?

The Master Plan specifically states under "Objectives for Program Components": that a plan will "provide for the coordination and articulation between regular and special programs" and that a further purpose shall be to "coordinate information from all sources including a comprehensive educational, psychological, sociological and health evaluation in order to properly evaluate the individual with exceptional needs." (3, p.23) These objectives relate most directly to the components of "Resource Specialist" (ibid, p.24) designated instruction, identification, assessment and instructional planning and the two levels of the School Appraisal Team (ibid, p.25) and the Educational Assessment Service (ibid, p.26) in assuring that a coordinated and comprehensive effort provides each eligible individual with appropriate services (i.e., psychological, health, social, work training programs, consultations, parent conferencing, counseling and guidance, career preparation, work study, etc.). The Master Plan for Special Education in California (3) makes it clear that "Special Education must be considered in the context of the public educational system..." (ibid, p.ii) and further, that "Special Education, however, may need to provide alternative services or supplements to the general school program for some exceptional individuals throughout their school years." (ibid, p.iii) As seen as part of a comprehensive plan, special education services includes "direct" (i.e., special consultation). The goal "is always to provide the exceptional individual with a program that meets his needs" (ibid, ii).

The implication is clear. Special Education will provide program, personnel, resources, coordination and planning in order to achieve these goals.

A summary statement provided recently at a meeting of the Commission on Special Education might help in clarifying the matter at this point. According to statements that have been made by sources close to the Department of Education and the Commission on Special Education, it seems:

I. Individuals designated as "exceptional individuals" in a comprehensive plan, and placed in special classes will be 100% funded by special education supplementary monies.

II. Individuals also designated as having an exceptional need, but who remain in regular classes will be the responsibility of a Pupil Personnel Services plan as far as general education services are concerned. (i.e., speech, psychological services, health services, counseling and guidance, etc.) to the extent that a system delivers these services to any "regular" pupil.

III. The pupils designated as in (II) above, will also receive supplementary services from "special education" in the form of a "Resource Specialist" who will have responsibility to "coordinate" delivery of such services.

The point to be made here is that a comprehensive special education program will be designed and paid for with the purpose of delivering what will hopefully be not only an improved classroom educational program for certain individuals but what is tantamount to the traditional "pupil personnel services" for pupils designated, "individuals with exceptional needs." By definition these individuals may include pupils who are actually "assigned to regular classroom teachers for a majority of the school day" (3, p.30) and for whom designated services such as counseling, health services, etc., will be coordinated by the "Resource Specialist." The Resource Specialist has been defined by Leslie Brinegar, Associate Superintendent and Manager, Special Education Support Unit, State Department of Education, (2, p.2) as

having two priority functions (a)"to provide tutoring or small group instruction to children with minor defects (b) to provide teacher consulting services to those regular class teachers from whose room the resource specialist case load will come." Dr. Allan Simmons of the State Department of Education and formerly Chief of the Bureau for Mentally Exceptional Children (now assigned full time to Master Plan programming) and one of the chief architects of the Master Plan has stated in private conversation (while attending the Special Education Commission Meeting, Burlingame, Calif., April 1974) that he would see the role of the "Resource Specialist" as being naturally assumed by the school psychologist in many areas. Dr. Simmons further stated his feeling that money allocated for services for those defined as individuals with exceptional needs and assigned to a special class or center or resource specialist program could be used to insure delivery of all appropriate services to those pupils. Dr. Simmons also stated that all other pupils (e.g., those with minimal handicaps and functioning as regular class pupils) would need to be and would be assumed to be served by the pupil personnel services program. Logically then it would seem the special education administrator, or ("person who has primary responsibility for special education in each geographic area encompassed by comprehensive plan") (3, p.36) would also need to be one in an administrative position in the hierarchical structure sufficient to insure forces are brought to bear to achieve the goals the plan he is responsible for was created to achieve (namely, full service to all pupils with exceptional needs in the plan, in special classes centers, or regular classes and who would be in need of counseling, psychological, or other special services).

We thus face a potentially disheartening prospect, at least partly the result of good intentioned efforts by "separate" Bureaus to create plans to improve services. The paradoxical fact may well exist that pupils now

intentionally left out of special education categories and classes will, as a result of a "Comprehensive Plan" become ineligible for further necessary services if pupil personnel departments or staff members cannot or will not service them.

Herein lies the crux of the difficulty that will surely run the best planned intentions afoul or necessitate the administrative restructuring of many local educational agencies as they now exist.

Implications

The fact that pupil personnel services departments are often separate entities from special education departments in the public schools and that pupil personnel services departments often feel a legitimate responsibility to provide their kinds of services to all pupils (but usually do not, or cannot) portends great difficulties for strong but separate administrative departments to work together with split responsibility and split authority to serve every handicapped pupil as part of a comprehensive special education plan. The point is that the comprehensive special education planner would be required to detail specific responsibilities to everyone ostensibly participating in a plan (including nurses, school psychologists, speech therapists, etc.) or at the very least to stipulate (guarantee) that certain functions are to be carried out by certain individuals or agencies on behalf of the exceptional individual within the comprehensive plan for which the special education administrator ostensibly has responsibility. However, in a typical administrative structure as mentioned above such a special education administrator or "advocate" often would not have the authority to see that details and the services of the required program were carried out by personnel working in other departments or agencies, unless the Board Adopted Plan specifically gives such authority to such individuals.

Obviously, one of the major results hoped for in creation of a so-called "Comprehensive Plan" is the fixing of responsibility for making the plan work. As we have seen all too often, however, despite certain idealistic "management" models, there can be no fixing of responsibility without commensurate "authorities."

While the Master Plan admittedly is intended as a general statement, and gathers much of its power from the lack of specific detail, there has, for example, been much disagreement and concern over what detail should give shape or form to the position of the "Resource Specialist." (3, p.24)

Major concern has been expressed over this, as yet, unclearly defined specialist position (which apparently will not require a separate specialist credential) and whether an individual so assigned could reasonably, as a coordinator, be expected to fulfill all the functions presently described for such a person within the milieu and constraints so often existing based upon "political" subdivisions within school staff, administration, and among "specialist" personnel, and especially in the absence of "plenipotentiary" status. Chief among these are only three of several separate items listed are the following: "coordinate designated instruction and services for those pupils assigned to regular classroom teachers for a majority of the day" and "should coordinate interpretation and implementation of educational and psychological findings," and further "may coordinate educational guidance to children with special problems and their parents." (ibid, p.30)

A further point to be made here is in the form of a question. How many Special Education Directors (or assigned CPA administrators) in special education departments have such full time personnel at their disposal or can anticipate requiring such additions to their own staff in order to insure accomplishment of such overall coordinated comprehensive activities? The implication is clear, especially for small districts and rural areas.

In order to be able to develop a comprehensive plan and effectively carry it out many administrative structures and systems will have to change drastically. If the reader now also fails to grasp the "clarity" of the existing or planned inter-relationship of the "plans" and activities of the Bureau of Pupil Personnel Services and the Special Education Support Unit then this author is communicating. Compound the apparent lack of an overall state level commitment to a unified approach to a delivery of service, at least to groups of similar pupils, (i.e., handicapped) even under newly developed (and apparently autonomously prepared) plans with local multi-administrative personnel and political requirements (and certainly multi-dimensional pupil requirements) and it can be quickly appreciated that we are again perhaps traveling down the all too familiar path on our way to the tunnel at the end of the light. It does not need to be over stressed that any numbers of independently developed "master plans" which purport to serve all needs of certain pupils (i.e., exceptional individuals) or all pupils at all grade levels (i.e., guidance services) without at least common mandating legislation, simply will not result in achievement of what might well be laudable goals of each of the separate plans (i.e., improved systems of service delivery to pupils).

As recently as the April 25, 1974 Special Education Commission meeting, (Burlingame, Calif.) an influential member of the commission, Dr. Robert Ponce, stated privately that he had concerns very much similar to those of this author and also that he had been unaware until approximately 5 or 6 months earlier than the date of the meeting (about the time the Master Plan was being prepared for adoption by the Board of Education) that another department or bureau other than special education (within the State Department of Education) was already developing another plan independently from any input

from or to the Special Education Commission even though the so called "Plan for Guidance Services" ostensibly and vitally purports to reach every pupil in California schools (including those specifically for whom the Master Plan for Special Education was developed to serve). If the reader now seems also to feel a vague dissatisfaction or uncertainty with regard to what local advantages or results might obtain, the author is again communicating. Let us now take the case of a hypothetical pupil who, to name just a few is: (1) a "racist" (2) "a campus behavioral problem" and (3) "a drug addict" with (4) "venereal disease" who also (5) "needs to know how to get a good job," and is being guided by (6) pupil personnel services coordinator or specialist in these matters, and who also happens to be in need of services or program components as an (7) "individual with exceptional needs" being also guided by (9) "a Resource Specialist" and given service by a program of (10) "designated instruction" (i.e., speech therapy) given in a program developed by a (11) "Program Specialist" and who is also to receive services of some (12) social (13) health (14) welfare or (15) Regional Center Agency and as part of an independently contracted public or (16) private resource (private schools included) as overall services "guaranteed" by a (17) Comprehensive Planning Agency administrator who (18) has perhaps currently no authority or control over practically any aspect of the functioning of those involved in such an overall program (or even in various "in-house" personnel supposedly participating in the local "guaranteed" plan as in many existing traditional hierarchies) and one may begin to appreciate that the now familiar pupil is simply being cut into several "new" pieces.

We are about to witness either potentially the greatest boon or one of the greatest horror stories ever told in California "special" education. The prospect for achieving a more "coordinated" effort is made more doubtful

as we become aware that still another department within the Education Department (Vocational Education) is working out its own independent plan for slicing a larger "piece of the action" from the already seriously "Departmentalized" (sic) pupil. In the final analysis, of course, as in all areas involving human and institutional interaction, no plan, whether mandated or permissive, will achieve the ultimate result of being of primary benefit to the individual pupil unless persons involved in the planning of a service delivery effort are committed above all else to a kind of selfless professionalism in considering the needs of pupils to be served. The point here is that where such relationships do not exist or cannot be developed (for lack of desire, outmoded, organizational or administrative models, lack of mandatory code provisions, etc.) any plan, mandatory or not, will prove ineffective or even harmful. Are we making progress? Who's on first?

Conclusions and Recommendations

A careful reading of all the documents available to us at this point reveals the following and leads to these conclusions: "the plan" for improvement of guidance services is not really a plan as such and is not likely to be adopted State wide and implemented by legislation in the near future, if at all. The Master Plan for Special Education is a plan and a reality now. Legislation will probably mandate its implementation statewide in the next several years. The "plan" for pupil and guidance services is pregnant with findings, conclusions and recommendations but makes no attempt to develop a system other than to suggest "a system by which any district or county office can identify its own needs and priority problems." (4,p.3) The existing relationship in many intra-agency departments, administratively (i.e., between numerous separate administrative or quasi-administrative

function areas each with a certain autonomy not coordinated by a single authority or special education advocate) will have to change in order to develop and carry out a comprehensive "plan." The potential difficulties inherent between special education personnel attempting to deliver or carry out legally mandated services for programs for these "exceptional individuals" and with other personnel not accustomed to "contract" type arrangements for services on an as-requested-by-special education-personnel-basis are a serious impediment worthy of the most serious consideration by any local educational agency contemplating the development and implementation of a viable "comprehensive plan." Comprehensive planning agencies should reorganize administrative structures wherever necessary to insure that a centrally coordinated locus of responsibility with "authority" exists to develop and insure the implementation of the plan to be given Board approval. The single responsible comprehensive planning agency administrator described in the Master Plan as "a qualified administrator of special education and such additional administrative supervisory and consultant personnel as required to fulfill the school's designated responsibility for special education" (3, p.12) and further that as a function "such administrator should act to insure that each exceptional individual within its jurisdiction receive adequate special education services" (ibid,p.17) will either need to have administrative authority over a wide range of service personnel (including PPS and others) to insure appropriate participation or will need to have certain additional key staff persons employed by him and reporting directly to him on an ongoing basis.

An additional and final recommendation centers on the question of "Who's on First?" While many pupil personnel services (or other) departments may wish to continue considering the special education program its "handicapped" stepchild, forever tied to its parent, the time of necessity for mothering

the invention has come. The invention is the legitimate special education program, and services to "individuals with exceptional needs" in regular or special programs, will (must) be appropriately provided for by the designated special education administrator. By force of legislative mandate in the State of California, heretofore relatively autonomous departments or "political subdivisions" within districts, county schools or combination or agencies who are practicing their own unique brand of "dilettantism" must eventually be willing to accept their role in a larger working plan. Without facilitating legal mandate, organizational or administrative structure, and positive human cooperation there can be no viable "comprehensive plan" developed, approved, funded, and operated at any particular level which will be participating in the new program.

It cannot be overstressed at this critical time in preparations to develop and operate approved and required "Comprehensive Plans" that local school boards and superintendents in California intending to authorize and guarantee services to all those in plans developed under Comprehensive Planning Agency auspices be prepared to develop policies and effect organizational or staff changes wherever necessary to facilitate and insure responsibilities are met. This has become even more critical in light of recent legal developments based upon parent, citizen and organization advocacy across the United States.

In addition, other service delivery planning and community agencies such as Developmental Disabilities Area Boards, Regional Centers, Health and Welfare Departments, private care facilities, etc., should be aware of the direction the educational "Comprehensive Planning" Agency will need to go in order to insure an adequate range of education related services. These agencies should be prepared to enter into "inter-agency" planning and contract

for services commitments if all individuals to be served are to be insured appropriate service. Educational agencies simply will not, under normal circumstances, have the necessary resources. This factor becomes especially critical in small district and rural school areas. Finally and perhaps most importantly, local educational agencies and their appropriate responsible administrators will need to be prepared to enter into agreements with other agencies or resources, and provide the necessary coordinated effort to accomplish this.

Summary

Finally, Special Education Departments have come of their own. Comprehensive Planning Agency special education administrators will need autonomy to manage the many aspects of a Board approved comprehensive plan. Local agencies which have an organizational structure not conducive to insured management and operational controls at these critical levels will not be able to operate a viable, total, coordinated Special Programs effort in special education.

Comprehensive Planning Agency responsibility, as is the intent of the Master Plan, is to be vested in a local special education advocate. There can be no ultimate responsibility without "authority" (administrative) to insure the working of the inter-relationships of the plan. Sufficient special education staff will be required at each agency level to insure development and operation of a total, managed effort. We are not simply contrasting here the relative arguments over the "authoritarian" or "humanistic" management styles. It should be obvious in today's society that regardless of "technique" or "style" one still needs "clout" in an ultimate sense to "insure" anything.

Many current organizational structures and patterns are inadequate to fix responsibility with the appropriate "special education administrator," (3, p.12) and will need to be drastically redrawn.

Existing Special Education departments, without additional "intra-departmental" expansion of personnel could help to insure adequate delivery of certain "Pupil Personnel" and other services if at least all the following necessary (but not necessarily sufficient) conditions are met:

1. Existing personnel from other departments were "contracted" for performance as necessary, or
2. Special Education were free to "contract" with available outside professional personnel for services (such as speech, health services, psychologicals, etc.), and not constrained with use of existing personnel, or
3. A combination of the above.

Without guarantees of at least the performance requirements we have outlined in this paper, a "Comprehensive Plan" could not be a viable reality. This is true especially in a local educational agency which continued to maintain outmoded organizational patterns not facilitating coordinated "fixed" responsibility along with "authority" vested in appropriate personnel who are in the best position by training and experience to deal in the larger sphere of Special Education, Pupil Personnel and other ancillary and community services to insure plan requirements are met.

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